

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE HUDSON'S BAY COMPANY DATA
SECURITY INCIDENT CONSUMER
LITIGATION

Case No. 1:18-cv-08472 (PKC)

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs in the above-captioned action ("Plaintiffs"), by and through their attorneys, respectfully move this Court for an Order granting final approval of the proposed class action settlement ("Settlement"). In support of this unopposed motion, Plaintiffs rely on the attached Memorandum of Law, the Joint Declaration and its supporting exhibits, all documents filed therewith, and the arguments of counsel. Based on the foregoing, Plaintiffs ask that the Court enter the proposed Final Judgment, thereby

1. Granting Final Approval of the Settlement;
2. Finally certifying the Settlement Class, appointing Timothy J. Peter of Faruqi & Faruqi, LLP and Janine L. Pollack of Calcaterra Pollack LLP as Class Counsel;
3. Approving a service award of \$1,000 for each of the Plaintiffs (totaling \$15,000);
and
4. Approving Class Counsel's request for attorneys' fees, costs, and expenses in the amount of \$1,400,000.

Dated: October 29, 2021

Respectfully Submitted,

/s/ Janine L. Pollack

Janine L. Pollack

CALCATERRA POLLACK LLP

1140 Avenue of the Americas, 9th Floor

New York, NY 10036-5803

Tel: (212) 899-1761

Fax: (332) 206-2073
jpollack@calcaterrapollack.com

/s/ Timothy J. Peter
Timothy J. Peter
FARUQI & FARUQI, LLP
1617 JFK Boulevard, Ste. 1550
Philadelphia, PA 19103
Tel: (215) 277-5770
Fax: (215) 277-5771
tpeter@faruqlaw.com

*Interim Co-Lead Counsel for
Plaintiffs and the Class*

CERTIFICATE OF ELECTRONIC SIGNATURE CONSENT

Pursuant to S.D.N.Y. Electronic Case Filing Rules & Instructions Section 8.5(b), I, Timothy J. Peter, represent that Janine L. Pollack consented to her electronic signature being used in this document.

/s/ Timothy J. Peter
Timothy J. Peter (admitted *pro hac vice*)